



John MacDonald, Partner & Office Head  
Cybersecurity & Data Privacy Team  
3120 Princeton Pike, Suite 301  
Lawrenceville, NJ 08648  
jmacdonald@constangy.com  
609.454.0096

March 19, 2025

**BY ECF**

Honorable Harvey Bartle III, U.S.D.J.  
United States District Court  
Eastern District of Pennsylvania  
16614 U.S. Courthouse  
601 Market Street  
Philadelphia, Pennsylvania 19106

**Re: *Atlas Data Privacy Corporation, et al v. Accurate Append, Inc., et al*  
Case No. 1:24-cv-04324-HB  
Joinder in Defendants' Consolidated Motion to Dismiss Plaintiffs' Complaint**

Dear Judge Bartle:

This firm represents the defendants Restoration of America and Voter Reference Foundation LLC (“Defendants”) in the above-referenced matters. We write to advise the Court that Defendant joins the Consolidated Motion to Dismiss Brief, which was filed today in the action captioned as *Atlas Data Privacy Corporation, et al. v. DM Group, Inc., et al.*, Civil Action No. 1:24-cv-04075 (the “Consolidated Motion to Dismiss”). For the reasons set forth in the Consolidated Motion to Dismiss, Defendants respectfully request that the Court grant the motion and dismiss Plaintiffs’ Complaint in this matter.

Respectfully submitted,

*/s/ John E. MacDonald*

John E. MacDonald  
Partner & Office Head, Cybersecurity & Data Privacy Team